

23 September 2010


Ms. Kirsten Walli, Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON  
M4P 1E4

Dear Ms Walli:

**Re: EB-2010-0220 – OPA Licence Renewal – GEC submissions**

Attached please find GEC's submission in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Poch', with a stylized flourish at the end.

David Poch

Cc: OPA

## GEC SUBMISSIONS

### OPA APPLICATION FOR LICENCE RENEWAL

GEC has reviewed OPA's proposed revisions to the wording of its licence. GEC urges the Board to include a provision requiring the submission of an Integrated plan no less frequently than every five years whether required more frequently by regulation or Ministerial Direction or not.

GEC is concerned that transparency, access to information and public input into the planning process will be potentially compromised if regular review is not guaranteed. Given the possibility that the three year requirement in the regulations will be relaxed, it is vital that the Board set a maximum period.

Further, by specifying a limit the Board will signal to OPA that it must prepare in a timely manner for such resubmission.

The ability of the Board to require resubmission at an earlier time is also important to include given the potential for rapidly changing circumstances. That ability, however, is not a substitute for a mandatory maximum period as it does not provide a strong signal to OPA of the need to re-file regularly nor does it guarantee to stakeholders that there will be a regular opportunity for review. This is particularly important given the likelihood that OPA will be pursuing a change to the regulation requiring three year reviews.

We suggest the following language:

#### **10 Integrated Power System Planning Process**

10.1 The Licensee shall develop and submit an integrated power system plan to the Board for review and approval ~~at least once every three years~~ as frequently as required by regulation, or more frequently if required by the Minister or the Board but in no case shall an integrated plan be submitted less frequently than every five years.

10.2 When required under section 25.30 (5) of the *Electricity Act*, the Licensee shall resubmit the integrated power system plan to the Board within such time as may be specified by the Board.

**All of which is submitted this 23<sup>rd</sup> day of September, 2010-09-23**

**David Poch  
Counsel for GEC**